

US EPA ARCHIVE DOCUMENT

**MERCURY-CONTAINING LAMPS
RESPONSE TO COMMENTS**

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Volume I

Commenter Information

<u>Comment Code</u>	<u>Description of Issue</u>
BAK	Background information on the organization
REF	Reference to comments submitted by another organization

Comments on the Universal Waste Rule Option

<u>Comment Code</u>	<u>Description of Issue</u>
UNWAS1	General comments on the universal waste option
UNWAS2	Inclusion of other lamps (e.g., incandescent and neon) in addition to mercury lamps
UNWAS3	Notification requirement for universal waste handlers storing more than 35,000 spent mercury-containing lamps
UNWAS4	Storage limit of one year and other alternatives for demonstrating storage time
UNWAS5	Tracking requirements; use of manifest, shipping papers, or other alternatives
UNWAS6	Management controls; comments on packaging, storage, transportation, and crushing lamps

Comments on Issues Raised in the Proposed Rule

<u>Comment Code</u>	<u>Description of Issue</u>
ALTERN	Suggested alternatives and/or additions to the proposed options that will still protect human health and the environment
CURRENT	Present management practices (storage, handling, treatment) of mercury-containing lamps

<u>Comment Code</u>	<u>Description of Issue</u>
DEF	Definition of A lamp @ and A mercury-containing lamp @
ECON	Economic impact and compliance costs; other cost information
FATE	Release, fate, and transport of mercury in waste, groundwater, and air
GEN	General comments not elsewhere classified
GREEN	Energy-efficient light programs such as Green Lights

Volume II

Comments on Issues Raised in the Proposed Rule (continued)

<u>Comment Code</u>	<u>Description of Issue</u>
MERC	Health effects and/or ecological effects of mercury in the environment
PRA	Paperwork Reduction Act
REC	Recycling operations (both general and specific to mercury-lamp recyclers)
REGFLEX	Regulatory Flexibility Act; effect on small businesses
REGLAN	Suggested changes to the proposed regulatory language
SRED	Source reduction initiatives and/or programs involving reduction of mercury in lamps
STAUTH	State regulation of mercury-containing lamps and enforcement; state authorization issues
SUN	Sunset provision for both options
TIME	Request for an extension to the comment period
TOX	Measuring toxicity of mercury in lamps and other metal wastes; issues pertaining to the TCLP or MINTEQ
UWRULE	General comments on the Universal Waste regulations that are now specific to mercury-containing lamps

<u>Comment Code</u>	<u>Description of Issue</u>
DATA1	Additional data on mercury in municipal solid waste landfill and/or other solid waste landfill leachate, groundwater, air emissions
DATA2	Additional data on releases of mercury during storage, transportation, and waste management
DATA3	Additional data on air transport of mercury; mercury methylation process; studies that measure amount of mercury released from broken lamps
DATA4	Additional information on mercury-containing lamp recycling operations and practices
DATA5	Additional data on cost and benefits of including handling requirements as a criteria for the conditional exclusion option
DATA6	Additional data on the toxicity of lamps other than mercury-containing lamps

Comments on the Conditional Exclusion Option

<u>Comment Code</u>	<u>Description of Issue</u>
EXCL1	General comments on the conditional exclusion for mercury-containing lamps
EXCL2	Exclusion criteria: disposal in AEP A-approved units
EXCL3	Exclusion criteria: reclaimed in state-permitted or registered recycling facilities
EXCL4	Exclusion criteria: prohibition on disposal in municipal waste combustors
EXCL5	Exclusion criteria: storage and handling requirements during transportation
EXCL6	Exclusion criteria: recordkeeping requirements and alternatives for demonstrating compliance
EXCL7	Exclusion criteria: expanding proposed exclusion to include disposal in non-municipal solid waste Subtitle D facilities